

UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
Charlottesville Division

IN RE: PARHAM CONSTRUCTION COMPANY
Debtor

CASE NO. 15-61060

MOTION TO QUASH GARNISHMENT

Comes now your applicant, Parham Construction Company, by counsel, pursuant to Bankruptcy Code §362(a), and represents:

1. That your applicant has filed a petition for relief under Chapter 11 of Title 11 of the United States Code.

2. That your applicant is subject to a garnishment issued by the Circuit Court of Norfolk, Virginia, 150 St. Paul's Blvd, 7th Floor, Norfolk, VA 23510 prior to the filing of the petition.

3. That said garnishment is in favor of Carter Machinery Company, c/o C. Wiley Grandy, Esq., 150 W. Main St., Ste. 1500, Norfolk, VA 23510 and has required that funds be withheld within 90 days prior to the filing of applicant's petition by Barton Malow Company, 100 10th St., N.E., Ste. 100, Charlottesville, VA 22902.

WHEREFORE, your applicant prays that said garnishment be quashed and that it have such other and further relief as the nature of the case may require.

Respectfully submitted,
PARHAM CONSTRUCTION COMPANY

By counsel

/s/Douglas E. Little

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